## REMARKS

This paper is submitted in reply to the Office Action dated July 1, 2004, within the three-month period for response. Reconsideration and allowance of all pending claims are respectfully requested.

In the subject Office Action, claim 24 was rejected under 35 U.S.C. § 112, second paragraph, and claims 1-27 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,536,597 to Porter et al. Applicants respectfully traverse the Examiner's rejections to the extent they are maintained.

First, with respect to the rejection of claim 24, the Examiner will note that claim 24 has now been amended to correct the lack of antecedent basis. Withdrawal of the rejection under 35 U.S.C. § 112, second paragraph, is therefore respectfully requested.

Second, with respect to the rejection under 35 U.S.C. § 102, and turning first to the rejection of claim 1, claim 1 recites a method of accessing a group in a <u>clustered</u> <u>computer system</u>, where the clustered computer system includes a plurality of nodes, and where the group includes a plurality of members resident respectively on the plurality of nodes. The claimed method includes the step of receiving an access request on a first node in the plurality of nodes, where the access request identifies a <u>cluster-private group</u> name associated with the group. The method also includes the step of processing the access request on the first node to initiate a group operation on at least a subset of the plurality of nodes that map to the cluster-private group name.

Porter et al., on the other hand, is directed to a system used in a telecommunications network to assist in routing data communications through the network. The reference discloses the use of a network resource manager that coordinates the utilization of resources in a plurality of nodes in the telecommunications network. As described at column 4, lines 49-59, the types of resources include communication ports, voice response units, store and forward devices, multiplexers, modems, and other components used in providing network related services.

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Of note, however, Porter et al. does not disclose clustering or clustered computer systems, or groups that may be resident in such systems. Porter et al. also fails to disclose the use of any entity that is analogous to a cluster-private group name.

Claim 1 specifically recites the access of a group in a clustered computer system, where the group includes a plurality of members resident on a plurality of nodes in the clustered computer system. As described at page 1, lines 9-14 of the application, "clustering" refers to a computer system organization where multiple computers or nodes are networked together to cooperatively perform computer tasks in such a manner that all of the nodes present a <u>single system image</u>. Moreover, as described at page 1, line 27 to page 2, line 4, clustered computer systems rely upon "groups" of jobs or tasks that cooperatively perform computer tasks on behalf of a clustered computer system.

Porter et al. has no disclosure that is even arguably analogous to a clustered computer system or the use of jobs or members of a group that are resident on a plurality of nodes in such a system. Indeed, a keyword search of the reference uncovers no instances of the word "cluster" or any analogous terms, and the only usage of the term "group" is in the context of "trunk" groups which are groups of trunk lines in a network, and thus which are an entirely different concept from the cluster groups recited in claim 1.

Moreover, it is important to note that claim1 refers to the receipt and processing of an access request that identifies a <u>cluster-private group name</u> associated with a group. As discussed at page 7, lines 2-13, a "cluster-private group name" is a unique identifier that <u>cannot be accessed outside of a node that participates in a cluster</u>. One example of a cluster-private group name is a group name that is resident on a node that participates in a cluster instance, and is accessible by jobs executing on that node (i.e., the group name is local to the node). Another example of a cluster-private group name is a group name that is accessible only to nodes and/or jobs that can establish participation in a cluster via an authentication mechanism.

The Examiner does not specifically point out any disclosure in Porter et al. purporting to correspond to a cluster-private group name, or to any "private" (i.e., non-

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universally accessible) identifier. In rejecting claim 1, the Examiner relies on column 4, lines 29-48 of Porter et al. However, the only concept in this passage that would appear to refer to names or mapping of names to addresses is the concept of a "universal directory function." Given that Porter et al. discloses a "universal" directory, however, it does not appear that the disclosed directory function is "private" in any respect.

Accordingly, Applicants respectfully submit that Porter et al. cannot be read to disclose a "cluster-private group name" that is accessible only by a node that participates in a cluster.

Given that Porter et al. does not disclose the concepts of clustering or groups, nor discloses the concept of a cluster-private group name, Applicants respectfully submit that claim 1 is novel over Porter et al.

Moreover, Applicants respectfully submit that claim 1 is non-obvious over Porter et al., as there is no suggestion in the reference, or elsewhere in the prior art of record, of the desirability of utilizing of a cluster-private group name to process access requests in a clustered computer system. Porter et al., which is not even directed to clustering, cannot be relied upon to provide any evidence of a motivation in the art, and the Examiner has pointed to no other specific art to support such a position. Accordingly, Applicants respectfully submit that claim 1 is also non-obvious over Porter et al. Reconsideration and allowance of claim 1, as well as of claims 2-14 which depend therefrom, are therefore respectfully requested.

Next, with respect to independent claims 15, 25 and 26, each of these claims likewise recites the concept of a clustered computer system, along with the use of a cluster-private group name in connection with the processing of an access request to initiate a group operation on at least a subset of a plurality of nodes in a clustered computer system. As discussed above in connection with claim 1, these concepts are not disclosed or suggested by Porter et al. Accordingly, Applicants respectfully submit that each of these claims is likewise novel and non-obvious over the prior art of record.

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Reconsideration and allowance of claims 15, 25 and 26, as well as of claims 16-24 and 27 which depend therefrom, are therefore respectfully requested.

As a final matter, Applicants traverse the Examiner's rejections of the various dependent claims on the basis of the dependency of these claims upon the aforementioned independent claims. Applicants do wish to note, however, that a number of these claims recite additional limitations that are neither disclosed nor suggested by Porter et al. Indeed, the Examiner has taken to citing passages of Porter et al. against each of these claims, without applying the specific teaching in the reference to the relevant claim language. Beyond this, however, Applicants note that Porter et al. does not disclose or suggest a number of features including, but not limited to: forwarding an access request to a clustering infrastructure (claims 3 and 17), processing an access request with a proxy job (claims 4-5 and 18), the use of a cluster-private data structure (claims 6 and 19), a cluster-private data structure that is accessible only from a particular node or by a particular job resident on the node (claims 8-9 and 21), and locally resolving a mapping between a cluster-private group name and a plurality of addresses (claims 14 and 24). The aforementioned claims are therefore patentable over Porter et al. for these additional reasons.

In summary, Applicants respectfully submit that all pending claims are novel and non-obvious over the prior art of record. Reconsideration and allowance of all pending claims are therefore respectfully requested. If the Examiner has any questions regarding the foregoing, or which might otherwise further this case onto allowance, the Examiner may contact the undersigned at (513) 241-2324. Moreover, if any other charges or credits

are necessary to complete this communication, please apply them to Deposit Account 23-3000.

10cr 2004

Date

Respectfully submitted,

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